

Tiffany Flenavgh
Name
548595
Prison Number
Fairbanks Correctional Center
Place of confinement
1931 Engan Street
Mailing address
Fairbanks, AK 99701
City, State, Zip
(907) 468-6700
Telephone

RECEIVED

JAN 01 2021
Clerk, U.S. District Court
Fairbanks, AK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

Tiffany Jamil Flenavgh
(Enter full name of plaintiff in this action)

Plaintiff,

vs.

Case No. 4:21-cv-00001-RRB
(To be supplied by Court)

Fairbanks Correctional Center
(Enter full names of defendant(s) in this action.
Do NOT use *et al.*)

Defendant(s).

PRISONER'S
COMPLAINT UNDER
THE CIVIL RIGHTS ACT
42 U.S.C. § 1983

A. Jurisdiction

Jurisdiction is invoked under 28 U.S.C. § 1343(a)(3).

B. Parties

1. Plaintiff: This complaint alleges that the civil rights of Tiffany Flenavgh
(print your name)
who presently resides at 1931 Engan Street Fairbanks, AK 99701
(mailing address or place of confinement)
were violated by the actions of the individual(s) named below.

2. **Defendants** (Make a copy of this page and provide same information if you are naming more than 3 defendants):

Defendant No. 1, Fairbanks Correctional Center is a citizen of Alaska, and is employed as a Pretrial Detention Center/authority.
(state) (name) (defendant's government position/title)

____ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☒ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

Defendant No. 2, _____ is a citizen of _____, and is employed as a _____.
(state) (name) (defendant's government position/title)

____ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

____ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

Defendant No. 3, _____ is a citizen of _____, and is employed as a _____.
(state) (name) (defendant's government position/title)

____ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

____ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

*****REMINDER*****

**You must exhaust your administrative remedies before your claim can go forward.
THE COURT MAY DISMISS ANY UNEXHAUSTED CLAIMS.**

C. Causes of Action (You may attach additional pages alleging other causes of action and facts supporting them if necessary. Make copies of page 5 and rename them pages 5A, 5B, etc. and rename the claims, "Claim 4," "Claim 5, etc.").

Claim 1: On or about November 27, 2020, my civil right to
(Date)

Medical Care
(Medical care, access to the courts, due process, freedom of religion, free speech, freedom of association, freedom from cruel and unusual punishment, etc. List **only one** violation.)

was violated by Medical at Fairbanks Correction Center and DCJ
(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 1. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 1.):

On the evening of November 27, 2020 there was an altercation that involved myself and another inmate, where I fell and injured my right pinky while in DCJ custody. I did not receive medical attention the day of the event, and later was told that "inmate Flanagan declined" medical attention. This is a falsified statement I immediately asked for medical attention, and told by nurse to fill out a 'Request For Intervention Form' in order to receive medical attention. I immediately filled out an RFI stating "my damn pinky is broke & I need an x-ray, thank you, ASAP." I was not seen by a nurse until December 04, 2020; I was made a homemade splint and sent back to housing area (in segregation). On December 07, 2020 I was sent to Health and Rehabilitation Services where Catherine Sunderland x-rayed my right pinky. I then discovered my pinky was fractured; one of the bones. On December 19, 2020, I put in another RFI asking if I had been approved to see an orthopedic about my fractured pinky. I was notified I had been approved. It is now December 28th, 2020 and I have yet to see an orthopedic. This infraction has caused major damage to my pinky. This infraction was dragged out and medical care was not provided in a timely fashion causing my pinky to heal through the fracture. This infraction is negligent in many ways as stated above from November 27, 2020 to present. Due to the customs used I am unable to bend my pinky normally.

(Medical care, access to the courts, due process, freedom of religion, free speech, freedom of association, freedom from cruel and unusual punishment, etc. List **only one** violation.)

Supporting Facts (Briefly describe facts you consider important to Claim 2. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 2.):

[illegible]

(Medical care, access to the courts, due process, freedom of religion, free speech, freedom of association, freedom from cruel and unusual punishment, etc. List **only one** violation.)

Supporting Facts (Briefly describe facts you consider important to Claim 3. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 3.):

This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

D. Previous Lawsuits

1. Have you begun other lawsuits in **state or federal court** dealing with the **same facts** involved in this action, **or otherwise relating to your imprisonment?** _____ Yes ☒ No

2. If your answer is "Yes," describe each lawsuit.

a. Lawsuit 1:

Plaintiff(s): _____

Defendant(s): _____

Name and location of court: _____

Docket number: _____ Name of judge: _____

Approximate date case was filed: _____ Date of final decision: _____

Disposition: _____ Dismissed _____ Appealed _____ Still pending

Issues Raised: _____

b. Lawsuit 2:

Plaintiff(s): _____

Defendant(s): _____

Name and location of court: _____

Docket number: _____ Name of judge: _____

Approximate date case was filed: _____ Date of final decision: _____

Disposition: _____ Dismissed _____ Appealed _____ Still pending

Issues Raised: _____

3. Have you filed an action in federal court that was dismissed because it was determined to be frivolous, malicious, or failed to state a claim upon which relief could be granted?

_____ Yes ☒ No

If your answer is "Yes," describe each lawsuit on the next page.

Lawsuit #1 dismissed as frivolous, malicious, or failed to state a claim:

- a. Defendant(s): _____
- b. Name of federal court _____ Case number: _____
- c. The case was dismissed as: ___ frivolous, ___ malicious and/or ___ failed to state a claim
- d. Issue(s) raised: _____
- e. Approximate date case was filed: _____ Date of final decision: _____

Lawsuit #2 dismissed as frivolous, malicious, or failed to state a claim:

- a. Defendant(s): _____
- b. Name of federal court _____ Case number: _____
- c. The case was dismissed as: ___ frivolous, ___ malicious and/or ___ failed to state a claim
- d. Issue(s) raised: _____
- e. Approximate date case was filed: _____ Date of final decision: _____

Lawsuit #3 dismissed as frivolous, malicious, or failed to state a claim:

- a. Defendant(s): _____
- b. Name of federal court _____ Case number: _____
- c. The case was dismissed as: ___ frivolous, ___ malicious and/or ___ failed to state a claim
- d. Issue(s) raised: _____
- e. Approximate date case was filed: _____ Date of final decision: _____

4. **Are you in imminent danger of serious physical injury?** ☒ Yes ☐ No

If your answer is "Yes," please describe how you are in danger, without legal argument/authority: Yes, The women in this facility are unpredictable
everyday since infraction i am in fear; serious physical injury.

F. Request for Relief

Plaintiff requests that this Court grant the following relief:

1. Damages in the amount of \$ _____
 2. Punitive damages in the amount of \$ 18,000.00 - 20,000.00
 3. An order requiring defendant(s) to from permanent damages in amount of 38,000.00
 4. A declaration that _____
 5. Other: A State of Alaska Memorandum should have been posted informing inmates that there would be a delay in medical care.
- Plaintiff demands a trial by jury. Yes ☒ No

DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares under penalty of perjury that s/he is the plaintiff in the above action, that s/he has read the above civil rights complaint and that the information contained in the complaint is true and correct.

Executed at Fairbanks Correction Center, Alaska on 12/28/2020
(Location) 99701 (Date)

T. J. F.
(Plaintiff's Signature)

(Original Signature of Attorney (if any) (Date)

Attorney's Address and Telephone Number